
School Re-Entry FAQs for School Nutrition

June 25, 2020 – Based on current available guidance from the USDA, schools will operate the National School Lunch Program (NSLP) and School Breakfast Program (SBP) in Fall 2020.¹ Due to the public health emergency, the USDA is providing meal program flexibilities to support student access to nutritious meals while minimizing the potential exposure to COVID-19.

Back to School NSLP and SBP Waivers to Allow:

1. [Non-Congregate Feeding in the Child Nutrition Programs – EXTENSION #2](#)
2. [Meal Service Time Flexibility in the National School Lunch Program, School Breakfast Program, and Child and Adult Care Food Program – EXTENSION #2](#)
3. [Parents and Guardians to Pick Up Meals for Children – EXTENSION #2](#)
4. [Meal Pattern Flexibility in the Child Nutrition Programs – EXTENSION #4](#)
5. [Offer Versus Serve Flexibility for Senior High Schools in the National School Lunch Program for School Year 2020-2021](#)

Back to School Meal Service Resources

- [School Nutrition Back to School Resources Webpage](#)
- [Flowchart of Back to School Meal Service Scenarios](#)
- [Scenario 1: Planning Checklist for Remote \(Grab and Go\) Meal Service](#)
- [Scenario 2A: Planning Checklist for In-Person Classroom Delivery and Dining Meal Service](#)
- [Scenario 2B: Planning Checklist for Meals Served in Cafeteria and Eaten in Classroom](#)
- [Scenario 2C: Planning Checklist for Standard Cafeteria Service](#)

Food Safety Considerations

- [School Meal Procedures During a Pandemic](#)
- [School Nutrition Food Safety Webpage](#)
- [Best Practices for Bus Stop Meal Delivery & Pick Up](#)
- [Effective Handwashing Graphic](#)
- [County or Tribal Health Departments](#)

¹ June 30, 2020 – Expiration date for the USDA Waiver to Extend Unanticipated School Closures. This waiver allowed schools to operate the Summer Food Service Program while schools were closed due to COVID-19 until June 30, 2020.

School Nutrition Re-Entry Questions & Answers

Please contact your [regional specialist](#) for specific questions about program operations.

1. How do I opt in to nutrition waivers for my school?

Please complete the [School Nutrition Back to School Flexibilities Survey](#) to indicate which waiver(s) your school will be opting into for SY 2020-2021. You can complete the waiver survey more than once if your needs change and you would like to opt into additional waivers.

2. Can I run the Summer Food Service Program (SFSP) when school re-starts in the fall?

No, schools must return to the National School Lunch Program and School Breakfast program. The Richard B. Russell National School Lunch Act at 42 U.S.Code § 1761(c)(1), and SFSP program regulations at 7 CFR § 225.6(b)(1), 7 CFR § 225.6(b)(4), 225.6(c)(1), 225.6(c)(2)(i)(G), 225.6(c)(3)(i)(B), 225.6(e)(1)(iii), 225.7(a), 225.7(d)(1)(i), 225.14(a), and 225.15(d)(1) limit SFSP operations to *unanticipated school closures* during the period from October through April of each school year.

3. Can I still serve all students for free like I did with the SFSP?

Schools must return to meal counting and claiming procedures for the NSLP and SBP. This means claiming students by free, reduced, and paid status, unless operating the Community Eligibility Provision (CEP). Monthly claims will be entered and submitted within the School Nutrition Programs section of [MAPS](#).

4. What days of the week can I serve meals to students for the NSLP?

Schools can serve and claim reimbursable meals to students on the days of the week that school is in session. Ensure your annual MAPS Application reflects the correct days of the week that meals are served and claimed for reimbursement.

5. Are grab and go meals allowed?

Yes, schools can provide grab and go meals for students who are participating in remote learning. Please complete the [School Nutrition Back to School Flexibilities Survey](#) to opt into the non-congregate meals and meal time waiver for the school year. Offer versus Serve is allowed when schools return to the NSLP in the fall.

6. Can parents pick up school meals without students being present?

Yes, parents can pick up meals for students who are participating in remote learning. Please complete the [School Nutrition Back to School Flexibilities Survey](#) to opt into the parent pick-up waiver for the school year.

7. Can we send multiple meals home with students for multiple days if they will be participating in remote learning?

Yes. Students who are attending school remotely may receive meals for multiple days at once, as long as it equates to one meal per child per day as allowed under the NSLP. Please complete the [School Nutrition Back to School Flexibilities Survey](#) to opt into the non-congregate and meal service time waivers.

8. Do I have to follow offer vs serve requirements for grab and go high school meals, as required under NSLP?

No. The [Nationwide Waiver to Allow Offer Versus Serve Flexibility for Senior High Schools in the National School Lunch Program for School Year 2020-2021](#) allows schools to opt out of offer versus serve for **high school** students. Ensure your annual MAPS agreement reflects this change. Offer versus serve is not a federal requirement for students in grades K-8; therefore, this waiver does not apply to these grade levels.

9. Do I have to serve lunch in the classroom?

Schools have [options](#) for which meal service best fits their needs. The [CDC Considerations for Schools](#) recommends meal service in the classroom. This is a recommendation, not a requirement. If [changing meal service operations to serve in the classroom](#), be prepared to provide food safety and meal counting training for any staff new to School Nutrition requirements, such as teachers, who may play a larger role in classroom meal service operations.

10. Can I use my salad bar or bulk milk dispenser?

A self-service set up is not recommended. Contact your [local health department](#) to confirm local food safety recommendations and requirements. The [CDC recommends](#) serving individually-plated meals in classrooms instead of a communal dining hall or cafeteria, using disposable food service items, or ensuring all non-disposable food service items are handled with gloves and washed with dish soap and hot water or in a dishwasher. For more information, refer to the OPI's [Food Safety webpage](#).

11. Do I still have to offer two types of milk when serving grab and go meals?

Yes. SFAs must offer students a variety of fluid milk (at least two different options). However, if emergency conditions temporarily prevent a school that normally has a supply of fluid milk from obtaining delivery of such milk, the State agency may allow the school to serve meals during the emergency period with an alternate form of fluid milk or without fluid milk. Contact your [regional specialist](#) for assistance.

12. Will OPI School Nutrition still conduct Administrative Reviews in SY 20-21.

Yes, OPI School Nutrition will continue to monitor School Nutrition Programs on a 5-year cycle. The SY 20-21 reviews will be conducted remotely with an emphasis on technical assistance.

13. When is the deadline to sign up for CEP?

[COVID-19 Child Nutrition Response #6](#) extended the deadline to elect to participate in CEP. If your school or district is eligible, you have until August 31, 2020 to sign up for CEP in MAPS.

14. Due to the unanticipated school closures, will there be an adjustment to the amount of USDA Foods entitlement assistance received by sponsors for the NSLP in the 2020-2021 school year?

MT OPI School Nutrition Programs has opted-in to a federal waiver that will lock in preliminary lunch counts for the 2020-2021 school year. The waiver applies to all sponsors of the NSLP in Montana; this means that the preliminary entitlement funds that were assigned in January 2020 at the time of the Annual Survey will be the final amount for the 2020-2021 school year. No action is needed by individual schools.

Entitlement Distribution can be found in MAPS > Food Distribution Program > Agencies > Contract > Contract Entitlement

15. Are we required to provide access to free potable water even if we are doing grab and go meals?

Yes. SFAs must provide access to free potable water to all students for lunch in each location where lunches are served during the meal service and for breakfast when breakfast is served in the cafeteria. SFAs have discretion as to the method that the water is offered. For example, access could be provided through water bottle fill stations in the hallway or by staff pouring cups of water for students as needed.

16. Do we need to use plate or tray coverings?

No. USDA regulations do not require plate or tray coverings. If you have specific food safety questions, please contact your [local health department](#).